

UNITED STATES BANKRUPTCY COURT
IN THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Deborah Hunter

Debtor

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Bankruptcy No. 18-11079-elf

Chapter 13

**ANSWER TO MOTION OF SELECT PORTFOLIO SERVICING INC. as SERVICER
FOR ABS REO TRUST VI FOR RELIEF FROM
THE AUTOMATIC STAY**

Debtor, by and through her attorney, Robert D. Steinberg, Esq. answers the
Motion as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor did not file the instant bankruptcy as to delay

foreclosure but as means to reorganize.

9. Denied. Debtor is without information sufficient to form a belief as to the
truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

To the extent that Debtor is in arrears post-petition, she can cure that arrearage

10. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

11. Denied. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial. It is further Denied that the Movant lacks adequate protection.

12. Admitted as to the allegation of value. As to the mortgage balance debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial.

13. This paragraph contains no allegations of fact and requires no response. It is denied that the movant is entitled to the relief requested.

14. Denied. Debtor is without information sufficient to form a belief as to the truth or falsity of said allegations and strict proof thereof is demanded at time of trial. Wherefore, debtor requests that this Honorable Court enter an Order denying the Motion for Relief.

Respectfully submitted,

BY: /s/ ROBERT D. STEINBERG
ROBERT D. STEINBERG, ESQ.
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Philadelphia, PA 19103
215-814-9225

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CERTIFICATE OF SERVICE

I, Robert D. Steinberg, Esquire, counsel for Debtor hereby certifies that a copy of the foregoing Answer to Motion for Relief of Select Portfilio Services was served on September 30, 2019 by regular mail to:

Daniel P. Jones, Esquire
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976

William C. Miller, Standing Trustee
PO Box 1229
Philadelphia, PA 19105

/s/ ROBERT D. STEINBERG
ROBERT D. STEINBERG, ESQ.